

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

ACTIVEVIDEO NETWORKS, INC.

Plaintiff,

v.

VERIZON COMMUNICATIONS INC., VERIZON
SERVICES CORP., VERIZON VIRGINIA INC.
AND VERIZON SOUTH INC.

Defendants.

Civil Action No. 2:10-cv-248
RAJ/FBS

**ACTIVEVIDEO NETWORKS, INC.'S MOTION TO SEAL PORTIONS OF
ACTIVEVIDEO NETWORKS, INC.'S MEMORANDUM IN SUPPORT OF
PLAINTIFF'S MOTION FOR A PERMANENT INJUNCTION, OR, ALTERNATIVELY,
ONGOING ROYALTIES AND PORTIONS OF THE DECLARATIONS AND CERTAIN
EXHIBITS FILED IN SUPPORT THEREOF**

Pursuant to Local Rule 5 and the Protective Order entered by the Court (Dkt. No. 155) ("Protective Order"), Plaintiff ActiveVideo Networks, Inc. ("ActiveVideo"), respectfully moves this Court for entry of the attached Order permitting ActiveVideo to file under seal (1) Portions of ActiveVideo's Memorandum in Support of its Motion for a Permanent Injunction, or, in the Alternative, Ongoing Royalties ("ActiveVideo's Injunction Memorandum"); (2) Portions of the Declaration of Jeffrey Miller in Support thereof ("Portions of the Miller Declaration"); (3) Exhibit A to the Miller Declaration; and (4) Portions of the Declaration of Gary Schanman in Support thereof ("Portions of the Schanman Declaration"). Grounds and authorities for this Motion are set forth in ActiveVideo's Memorandum in Support of Motion to Seal. In compliance with Local Rule 5, ActiveVideo attaches a Proposed Agreed Order as **Exhibit 1** and is filing separately a Public Notice of ActiveVideo's Motion to Seal. ActiveVideo requests that the Court retain sealed materials until forty-five (45) days after a final order is entered and

requests that, unless the case is appealed, any sealed materials be returned to counsel for the filing parties. The parties have agreed that confidential materials should be filed under seal.

Dated: August 12, 2011

Respectfully submitted,

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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